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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

The parties shall provide a joint status letter by May 25, 2022.

United States Magistrate Judge

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Case Number 1:21-cv-00351-GHW-DCF

# PARTIES' STIPULATED DISCOVERY SCHEDULE

# I. INTRODUCTION

As instructed by the Honorable Magistrate Judge Debra C. Freeman ("Magistrate") on April 15, 2022 (ECF No. 141), the parties have engaged in good faith discussions and jointly propose the following discovery schedule without prejudice to the pursuit of, or objection to, additional discovery by any party.

# II. STIPULATED DISCOVERY SCHEDULE

Timing	Event
No later than May 15, 2022:	Defendants to produce a one-month sample of data in satisfaction of discovery requests.
Ten months after MTD Decision:	Deadline to file Class Certification motion.
Twelve months after MTD Decision:	Deadline to file opposition to Class Certification motion.
Thirteen months after MTD Decision:	Deadline to file reply in support of Class Certification motion.
Fifteen months after MTD Decision:	Close of fact discovery (including all depositions).
Sixteen months after MTD Decision:	Deadline for Plaintiffs to file Expert Reports.
Eighteen months after MTD Decision:	Deadline for Defendants to file Expert Reports.
Nineteen months after MTD Decision:	Close of Expert discovery (including all depositions).

Dated: April 22, 2022

New York, New York

## Respectfully submitted,

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Interim Lead counsel for the proposed Class

cc: All Counsel of Record (via ECF)

SO ORDERED.

Dated: 4/25/22

New York, New York

VALERIE FIGUEREDO, U.S. Magistrate Judge